

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

IN THE MATTER OF:

**Madison-Kipp Corporation
201 Waubesa Street
Madison, Wisconsin 53704**

ATTENTION:

**Mr. Robert M. Johnston
President & COO**

Request to Provide Information Pursuant to the Clean Air Act

The U.S. Environmental Protection Agency (EPA) is requiring Madison-Kipp Corporation (MKC, or "you") to submit certain information about your facility at 201 Waubesa Street, Madison, Wisconsin, comprised of both the Atwood Plant and the Fair Oaks Plant (together, referred to hereinafter as the "facility"). Appendix C specifies the information that you must submit. Appendix B specifies the instructions you must follow in answering this information request. You may assert a claim of business confidentiality according to the requirements in Appendix A. You must send this information to us within 30 calendar days after you receive this request.

We are issuing this information request under Section 114(a) of the Clean Air Act (the Act), 42 U.S.C. § 7414(a). Section 114(a) authorizes the Administrator of EPA to require the submission of information. The Administrator has delegated this authority to the Director of the Air and Radiation Division, Region 5.

MKC owns and operates an emission source at your Madison, Wisconsin, facility. We are requesting this information to determine whether your emission source is complying with the Wisconsin State Implementation Plan.

Feb 2012-114
Request

You must send all required information to:

Attn: Compliance Tracker, AE-17J
Air Enforcement and Compliance Assurance Branch
U.S. Environmental Protection Agency, Region 5
77 W. Jackson Boulevard
Chicago, Illinois 60604

Under 40 C.F.R. Part 2, Subpart B, you may assert a claim of business confidentiality for any portion of the submitted information. You must specify the page, paragraph, and sentence when identifying the information subject to your claim. Appendix A specifies the assertion and substantiation requirements for business confidentiality claims. MKC must submit all requested information under an authorized signature with the following certification:

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Act, and 18 U.S.C. §§ 1001 and 1341.

We may use any information submitted in response to this request in an administrative, civil, or criminal action.

This request is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 *et seq.*, because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation. To aid in our electronic recordkeeping efforts, EPA requests that you provide all documents responsive to this request in an electronic format in accordance with a. through f., below. These submissions are in lieu of hard copy.

- a. Provide all responsive documents in Portable Document Format (PDF) or similar format, unless otherwise requested in specific questions. If the PDFs are scanned images, perform at least Optical Character Recognition (OCR) for "image over text" to allow the document to be searchable. Submitters providing secured PDFs should also provide unsecured versions for EPA use in repurposing text.

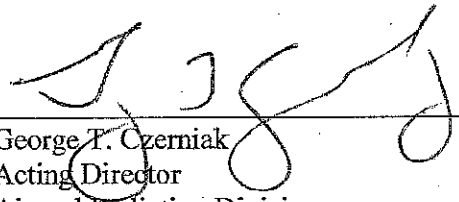
- b. When specific questions request data in electronic spreadsheet form, provide the data and corresponding information in editable Excel or Lotus format, and not in image format. If Excel or Lotus formats are not available, then the format should allow for data to be used in calculations by a standard spreadsheet program such as Excel or Lotus.
- c. Provide submission on physical media such as compact disc, flash drive, or other similar item.
- d. Provide a table of contents for each compact disc or flash drive containing electronic documents submitted in response to our request so that each document can be accurately identified in relation to your response to a specific question. *We recommend the use of electronic file folders organized by question number.* In addition, each compact disc or flash drive should be labeled appropriately (e.g., Company Name, Disk 1 of 4 for Information Request Response, Date of Response).
- e. Documents claimed as confidential business information (CBI) must be submitted on separate discs/drives apart from the non-confidential information. This will facilitate appropriate records management and appropriate handling and protection of the CBI. Please also mark each page that is confidential business information as such.
- f. Certify that the attached files have been scanned for viruses and indicate what program was used.

Failure to comply fully with this request for information may subject MKC to an enforcement action under Section 113 of the Act, 42 U.S.C. § 7413.

You should direct any questions about this request for information to Eleanor Kane at (312) 353-4840.

Date

2/15/12


George T. Czerniak
Acting Director
Air and Radiation Division

Appendix C

The following information must be supplied within 30 calendar days in accordance with the foregoing Request for Information pursuant to Section 114 of the Clean Air Act 42 U.S.C. § 7414. Questions refer to both the Atwood and the Fair Oaks plants (together, the "facility") located in Madison, Wisconsin.

1. Provide copies of all reports, notices, and certifications for calendar year 2010 submitted pursuant to Part 1, Section ZZZ(2)(a) of the facility's current Air Pollution Control Operation Permit #113125320-F10 (eff. 7/30/2008).
2. For the time period January 1, 2002, to the date of this request, provide copies of all reports relating to any stack testing, emission test runs, emissions characterizations, or emissions studies conducted or attempted at the facility. For each test or attempted test, submit the production rates during testing and describe the purpose of the testing (if such information is not already included in the report).
3. For the time period January 1, 2007, to the date of this request, provide copies of all opacity readings conducted at the facility using U.S. EPA Method 9.
4. For the time period January 1, 2007, to the date of this request, provide a description of all material charged in furnaces at the facility. Provide the name(s) and addresses of the entity or entities from which the charge materials were obtained.
5. *[eff. date of earlier permit]*
For the time period March 30, 2007, to the date of this request, provide copies of calculations and monthly totals for dioxin emissions performed in accordance with Air Pollution Control Operation Permit #113125320-F10 (issued 7/30/2008), Part I, Sections A(6)(b)(2) and (3), and Air Pollution Control Construction Permit 07-BAP-002 (issued March 30, 2007) Part I, Section A(6)(b)(2) and (3).
6. For the time period March 30, 2007, to the date of this request, provide all records generated or maintained pursuant to the sections of Air Pollution Control Operation Permit #113125320-F10, Part I, and Air Pollution Control Construction Permit number 07-BAP-002, delineated below. Where calculations are performed, include the numbers used in the calculations. Where records are kept electronically, please provide electronic copies as outlined in the cover letter.
 - a. Section A(1)(c)(4). Employee Training Records
 - b. Sections A(3)(c)(1)(a) and (b). Chlorine Feed Rate & Magnesium Content
 - c. Section A(3)(c)(2). Metal Temperature
 - d. Section A(3)(c)(3). Pump Amperage
 - e. Section A(3)(c)(4). Metal Level
 - f. Sections A(3)(c)(5)(a) and (b). Chlorine Use & Emissions
 - g. Section A(3)(c)(6)(b). Calibration Logs
 - h. Sections A(3)(c)(9)(a) and (b). Nitrogen Use
 - i. Section A(4)(c)(4)(a). Hydrogen Chloride Emissions

- j. Sections A(6)(c)(3)(a) and (b). Start/Stop Time for Chlorine & Other Materials
 - k. Section B(1)(c)(2). Fuel Type
 - l. Section B(1)(c)(4). Engine Maintenance
 - m. Section B(3)(c)(2)(a) and (b). Distillate Fuel Use
 - n. Section C(1)(c)(1). Visible Sign (Please provide a photograph.)
 - o. Section D(1)(c)(1)(a), (b), and (c). Die Lube Use
 - p. Section D(2)(c)(4)(a), (b), (c) and (d). Ambient Air Quality Standards
 - q. Section E(1)(c)(3)(a), (b), (c), and (d). Ambient Air Quality Standards
(This provision is included in Section E(2)(c)(3)(a), (b), (c) and (d) of the 07-BAP-002 permit)
 - r. Section E(2)(c)(1)(a), (b), and (c). Die Lube Use
(This provision is included in Section E(1)(c)(2)(a), (b), (c) and (d) of the 07-BAP-002 permit)
 - s. Section F(1)(c)(2). Employee Training Records
 - t. Section G(3)(c)(2)(a), and (b). HAP Emissions
7. For the time period January 1, 2007, to the date of this request, provide records showing the facility's total natural gas use.
8. For the time period January 1, 2007, to the date of this request, provide copies of any reports to local, state, or federal agencies of any natural gas leakage or other release to the environment from the facility. If no paper report was filed, provide a narrative description of the release, including the date and estimated quantity of the release, the agencies notified, and any actions taken to stop or mitigate the release.

CERTIFICATE OF MAILING

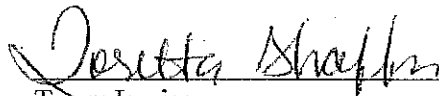
I, Tracy Jamison, certify that I sent a Request to Provide Information Pursuant to the
Clean Air Act by Certified Mail, Return Receipt Requested, to:

Mr. Robert M. Johnston
Madison-Kipp Corporation
201 Waubesa Street
Madison, WI 53704

I also certify that I sent a copy of the Request to Provide Information Pursuant to the
Clean Air Act by First-Class Mail to:

Thomas Roushar
South Central District Office
Wisconsin Department of Natural Resources
3911 Fish Hatchery Rd
Fitchburg, WI 53711

On the 17th day of February 2012.


Tracy Jamison
AECAB, PAS

CERTIFIED MAIL RECEIPT NUMBER:

70091680000076739245

Standard bcc's: Official File Copy w/Attachment (s)
Originating Organization Reading File w/Attachment(s)

Other bcc's:

Document Path: G:\Air Enforcement And Compliance Branch\Planning and
Administration Section\Documents Routed for Signature\MI
WI Documents\Kane\Madison-Kipp 114 Request [version
3.0].docx